M/019/005

ASBESTOS INSPECTION AND ASSESSMENT FOR THE TRAIN LOAD-OUT FACILITY MOAB SALT, LLC MOAB, UTAH

June 16, 2003

Prepared for:

Moab Salt, LLC
P.O. Box 1208
Moab, Utah 84532

Contact: Mr. Eric K. (Rick) York

Prepared by:

JBR Environmental Consultants, Inc.
8160 South Highland Drive
Sandy, Utah 84094

Contact: Mr. Claude Dahlk

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EXECUTIVE SUMMARY

JBR Environmental Consultants, Inc. (JBR) performed an asbestos inspection at the Train Load-out Facility at Moab Salt, LLC, located in Moab, Utah on June 13, 2003. The following table summarizes the results of the inspection and lists asbestos-containing building materials required to be abated. Attached to this Inspection and Assessment Report are Appendix A that contains all asbestos analytical results, Appendix B containing current certifications, and Appendix C, which contains a site map.

The asbestos-containing material (ACM) requiring abatement resulted from the recent removal of the Galbestos® sheeting and resultant surficial contamination of soils with paint chips that were chipped from the sheeting. The ACM identified at the Moab Salt, LLC Train Load-out Facility is described as follows:

ACM Type	Location	Quantity/ Condition	Percent Asbestos
1) Galbestos ® Sheeting (Asbestos paint coating over corrugated metal sheets)	On pallets near fence - Refer to Appendix C	~ 12,000 ft^2 / Friable	60% Chrysotile*
2) Asbestos Paint Chips from Galbestos® sheeting	In soils near Train Load-out Building - Refer to Appendix C	~ 131,000 ft^2/ Friable	10% - 30% Chrysotile

* Note: Similar material was analyzed during an asbestos survey conducted in 1999 by Earthfax.

The Galbestos® sheets prior to the renovation project were identified as non-friable materials. All sheets that were removed from the building during the project remain on-site and are stacked on pallets southeast of the Train Load-out Facility (see Appendix C). The removed Galbestos sheets that are on the pallets are considered friable do to the renovation operation. During our inspection, we observed that all Galbestos® sheeting was removed from the Train Load-out Facility with minimal paint chips on the upper levels. Based on our inspection, there are no air handler units, ducting or other interior surfaces that may have been impacted by this sheeting removal.

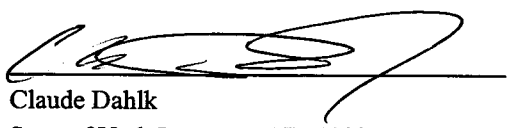
Until properly trained or abatement has been completed, no Moab Salt LLC employee or any other untrained contractor should enter the regulated area. Given the potential for damaging the weathered surface areas of some of the sheeting, JBR recommends that these materials be handled as friable materials. All sheeting should be double wrapped with 6 millimeter plastic sheeting, labeled as asbestos waste and placed into either a roll-off or trailer for transportation to East Carbon Development Corporation (ECDC) landfill.

During this evaluation, JBR determined that the area of surficial soils contaminated by paint chips dislodged during the removal of the Galbestos® sheeting was limited to the areas identified on the site map (Appendix C). Visible paint chips were observed within a defined affected area in the vicinity of the load-out. Paint chips occur as dispersed particles at the outer edges of the affected area and in greater contamination closer to the Train Load-out Facility.

An Asbestos Inspection and Assessment
at the
Train Load-out Facility
Moab Salt, LLC
Moab, Utah

On June 13, 2003, JBR Environmental Consultants, Inc. (JBR) of Sandy, Utah, conducted an asbestos survey and assessment at the Train Load-out Facility located at Moab Salt, LLC complex. One bulk sample of suspect asbestos-containing paint chips was collected by JBR and submitted for Polarized Light Microscopy (PLM) analysis. The following accredited inspector conducted the survey and assessment.

Inspector:



Claude Dahlk
State of Utah Inspector # IMJ08888

Date: 6-17-03

1.0 INTRODUCTION AND BACKGROUND

The Train Load-out Facility contained Galbestos® sheeting on approximately two thirds of the main structure and also on the exterior of the small loading chute located north of the main structure (Appendix C). The metal sheeting was removed by employees of Moab Salt, LLC from the building and placed on pallets near the southeast fence. During the removal process, paint chips from the Galbestos® sheeting contaminated surficial soils in the vicinity of the facility.

On June 13, 2003, JBR conducted an on-site inspection of the Train Load-out Facility and adjacent areas that may have been impacted during handling of the Galbestos® sheeting[1]. These areas were inspected primarily as the result of concerns for potential for asbestos release from the remaining sheets and paint chips within this affected area. The purpose of our inspection and assessment was to provide a detailed description inventory of the ACM located within this area and identify all areas impacted during the handling of the sheeting.

1.1 Methods and Materials

A survey of Train Load-out Facility located at Moab Salt, LLC was conducted to identify areas impacted by the Galbestos® sheeting removal. The inspection consisted of a detailed visual examination of the entire structure and the surrounding ground surface. The ground surface area that was contaminated by paint chips was identified and marked using barrier tape. The paint chip-contaminated soil areas are identified on the site map (Appendix C) attached to this report. JBR collected one (1) bulk sample of paint chips located on the ground near the Train Load-out building. The bulk sample was microscopically analyzed for asbestos content by Dixon Information of Salt Lake City, Utah. The Galbestos® sheets had been placed on pallets adjacent to a fence southeast of the building.

Dixon Information participates in the U.S. Environmental Protection Agency (EPA) Bulk Asbestos Sample Quality Assurance Program and the National Institute for Standards and Technology's National Voluntary Laboratory Accreditation Program (NVLAP). Asbestos percentages were estimated utilizing the polarized light microscopy (PLM) and dispersion staining methods as prescribed by the National Institute of Occupational Safety and Health (NIOSH).

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[1]Galbestos® is corrugated, galvanized sheet steel covered with an asbestos-containing coating.

The following forms were filled out by the accredited inspector and list, according to National Emission Standards for Hazardous Air Pollution (NESHAP), the classification and condition of the ACM identified during this inspection.

Train Load-out Building, Moab Salt, LLC, Moab, Utah
Date of Survey: June 13, 2003
NESHAP - REGULATED
ASBESTOS-CONTAINING MATERIALS (R-ACM)

1. Friable asbestos material (>1% asbestos and can be crumbled, pulverized or reduced to powder by hand pressure)
   ___Thermal system insulation (TSI - Air Cell®)*
   ___Textured ceiling material (TCM)*
   ___Spray-on insulation or fireproofing*
   ___Blown-in insulation*
   ___Ceiling tiles*
   ___Plaster, gypsum board, gypsum board joint compound*
   ___Cloth materials*
   ___Paper materials (Duct tape)*
   ___Electrical wiring insulation*
   ___Sink undercoating (loose)*
   ___Other (Insulation packing)*

2. Category I ACM which has become friable
   ___Packings
   ___Gaskets
   ___Resilient floor coverings (floor tile and sheet vinyl)
   ___Asphalt roofing products

3. Category I ACM that will be or has been subjected to sanding, grinding, cutting or abrading
   ___Packings
   ___Gaskets
   ___Resilient floor coverings (floor tile and sheet vinyl)
   ___Asphalt roofing products

4. Category II ACM that has a high probability of becoming or has become friable in the course of demolition or renovation operations
   ___Asbestos cement materials (transite)*
   ___Asphalt, tar and rubber-base ACM products other than roofing products*
   ___Non-asphalt and non-paper roofing products*
   XX Paint*
   ___Fire brick and/or mortar*
   ___Stainless steel sink undercoating (solid)*
   ___Encapsulated TCM*
   ___Encapsulated TSI*
   ___Mastic for floor tile, ceiling tile, cove molding, etc.*

Train Load-out Building, Moab Salt, LLC, Moab, Utah
Date of Survey: June 13, 2003
NESHAP NON-REGULATED
ASBESTOS-CONTAINING MATERIAL (N-R-ACM)

1. ≤ 1% asbestos

2. Category I Non-friable (cannot be crumbled, pulverized, or reduced to powder by hand pressure) ACM with >1% asbestos by new PLM procedure
   _____Packings
   _____Gaskets
   _____Resilient floor coverings (12" Floor Tile)
   _____Asphalt roofing products (Silver flashing)

3. Category II Non-friable ACM with >1% asbestos by new PLM procedure (Category includes items meeting Category I definition but not specifically listed in that category)
   _____Asbestos cement materials (transite)*
   _____Asphalt, tar and rubber-base ACM products other than roofing products (pipe covering)*
   _____Non-asphalt and non-paper roofing products*
   _____ Paint*
   _____Fire brick and/or mortar*
   _____Sink undercoating (solid)*
   _____ Mastic for floor tile
   _____Other (Window Glazing)*

Notes:

1. (*) denotes JBR's interpretation of materials included in this category.
2. "New PLM procedure" is outlined in Appendix A, Subpart F, 40 CFR, Part 783, Section 1, Polarized Light Microscopy.
3. The Environmental Protection Agency (EPA) National Emission Standard for Hazardous Air Pollutants (NESHAP) asbestos revision as outlined in 40 CFR, Part 61, became effective November 20, 1990. The asbestos classification system outlined in the revision and included in this section is dynamic in nature. Asbestos materials classified as "NON-REGULATED" at the time of the survey may become "REGULATED" due to ongoing or planned maintenance, renovation or demolition actions which can transform a material containing greater than 1% asbestos from a "non-friable" and NON-REGULATED to a "friable" and REGULATED condition. Classification of ACM in this section and in the executive summary of this report is, therefore, based on the observations of the surveyor at the time of the survey and may or may not be appropriate at later dates.
4. Maintenance, renovation, demolition, weathering, normal wear, water or other damage can alter the "NON-REGULATED" status of materials, and necessitate precautions required for handling them as "REGULATED" asbestos materials.

2.0 RESULTS

Results of the laboratory analyses of the bulk samples collected at the Train Load-out Facility are summarized in the table below.

Table 1 Bulk Sample Results

Sample No.	Material	Lab Results	Location
MS - 01	Paint Chip in Soil	10 - 30% Chrysotile	Near Train Load-out Building

3.0 REGULATORY DISCUSSION

The EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) includes standards for asbestos removal, transportation and disposal, and building demolition. These standards are enforced by the State of Utah Department of Environmental Quality, Division of Air Quality (DAQ).

The EPA requires that friable ACM be removed from buildings prior to demolition or renovation. Friable materials are those that can be crumbled, pulverized, or otherwise broken up by using hand or finger pressure when dry. The EPA defines friable ACM as any friable material containing more than 1% asbestos.

During the useful life of a building that contains friable ACM, building owners usually have to absorb the cost of asbestos removal. This is true even if the removal is not actually performed, because buildings in the United States are now commonly devalued at the time of sale by the estimated cost of removal. It is becoming common for building owners, prospective buyers and lenders to require that buildings be entirely free of all forms of ACM. It is possible that non-friable ACM will become more stringently regulated in the future.

The EPA does not presently regulate typically non-friable materials until they become friable or dust is created. The EPA allows these non-friable materials to be disposed of as ordinary demolition waste. Non-friable ACM can become friable over time through deterioration or when disturbed, such as during maintenance or removal operations. This can present a potential health hazard to employees. Accordingly, JBR ordinarily recommends that non-friable ACM be removed as part of scheduled renovation projects by EPA certified personnel.

4.0 RECOMMENDATIONS

4.1 Abatement/Remediation of Asbestos

Due to deterioration from age and weather, JBR recommends that all pallets of Galbestos® sheeting be handled as if they have the potential to become friable. All sheeting should be double wrapped with 6 millimeter plastic sheeting, labeled as asbestos waste, and placed into either a roll-off box or trailer for transportation to East Carbon Development Corporation (ECDC) landfill. ECDC is an approved asbestos waste disposal facility and is the closest such facility to the project area. All asbestos remediation activities require a contractor that is EPA-certified to handle asbestos materials.

The contractor is required to remove all paint chips within the project area defined on the site map (Appendix C). The outer edges of the perimeter can be abated using hand tools. However, for areas that contain a larger amount of paint chips, JBR recommends that a bobcat loader or back-hoe be used to remove all soils to a depth of 2 inches. This will ensure complete abatement of the asbestos materials. All levels within the structure should be abated of any paint chips. During this investigation, JBR observed minimal contamination within the structure.

Upon completion of the abatement, JBR recommends that a detailed asbestos inspection be conducted for the entire site. This will enable Moab Salt, LLC to inform its employees of any asbestos hazards currently on site and to develop plans to manage the remaining ACM on site safely and in accordance with all appropriate regulations. JBR would review any previous documents and conduct additional sampling as needed. Areas would be inspected for asbestos hazards as they pertain to employee exposures, potential for exposure, and probability for future damage. Following the inspection, JBR would prepare a plan for managing all remaining ACM and also recommendations for any further remedial activities that may be appropriate.

4.2 Employee Training and Awareness

On June 23, 2003 Moab Salt, LLC has scheduled employees to have two (2) hours of asbestos awareness training that will inform them of asbestos hazards present on-site. In addition, given the significant amount of Galbestos® sheeting used at this facility, JBR understands that Moab Salt wants several of its employees to be 40-hour trained as EPA certified Contractor/Supervisors. This will allow employees with the proper training to remove damaged sheeting or carry out other scheduled renovation projects in the future. This training has been scheduled for the week of June 23, 2003 as well.

Moab Salt, LLC should develop procedures and guidelines for employees to follow when damaged asbestos is encountered on-site. These procedures can be documented in a site-specific operations and maintenance (O&M) Plan. This plan could include having a contractor on-call for future scheduled renovation projects or emergency remediations. Alternatively, if employees are to be 40-hour trained to handle asbestos, only these trained personnel may perform the abatement activities, and they must wear proper personal protective equipment (PPE) and use approved abatement procedures.

Depending upon asbestos fiber concentrations within the containment area, proper PPE may include a half-faced respirator, Tyvek suites, leather gloves, safety glasses, and steel toed boots. If employees encounter abatement activities that may place them above the Personal Exposure Limit (PEL) for use of a half-faced respirators, then Powered Air Purifying Respirators (PAPR) will be required for use. Moab Salt, LLC should familiarize all 40-hour trained employees of specific OSHA/MSHA personal air monitoring requirements for asbestos abatement activities. These individuals are also required to have annual eight (8) hour refresher courses to maintain their certifications. In addition, these personnel should be familiar with all applicable Federal, State and local regulations as they pertain to asbestos abatement activities.

If during the course of routine maintenance or work activities, employees encounter areas of damaged ACM or have caused the damage, they should remove themselves from the building and contact the appropriate personnel as described in the awareness training and in the O&M Plan to notify them of the situation. Only certified personnel should conduct any clean-up or repair activities to damaged ACM areas or materials.

Prior to demolition or renovation of any of these structures, all contractors must be informed that some of the building materials may contain asbestos. Floor tiles, roofing materials, cove base mastic, and materials containing less than 1% asbestos are not EPA regulated materials. However, OSHA /MSHA mandates that certain worker precautions be taken by the renovation or demolition contractor.

Care should be taken to ensure that prior to removal, no ACM material is sanded, cut, drilled, or otherwise disturbed in a manner which would create dust. When cleaning is necessary, all dust in ACM-containing areas should be cleaned using wet methods. This, too, should be documented in the O&M Plan.

In consideration of the complex regulatory environment concerning the handling and removal of ACM and other hazardous materials, JBR makes the following general recommendations:

- All regulated ACM may only be handled by qualified and registered asbestos abatement companies. If Moab Salt, LLC provides employees with the proper EPA training, these materials may then be handled in-house upon registering itself with Utah DAQ.

- All regulated, friable ACM or ACM that would be made friable by maintenance renovation or demolition activity must be removed from client-owned or managed buildings prior to renovation or demolition activities.

- OSHA/MSHA regulations require that hazardous conditions be communicated to all affected employees. This document provides the required notification to employees pertaining to the Train Load-out Facility only.

- Hazardous materials such as mercury filled thermostats, hazardous chemicals (i.e. oils, paints, and cleaning solvents), fluorescent light tubes, refrigeration units containing Chlorofluorocarbon (CFC's), ballasts and other electrical equipment that contain Polychlorinated Bi-phenols (PCBs) should be removed for recycling, disposal, or re-use prior to demolition.

4.3 On-Site Disposal Alternative

Prior to future asbestos abatement projects, JBR recommends that Moab Salt, LLC consider permitting a landfill on-site to enable them to cost effectively abate the remaining Galbestos® sheeting or other ACM and dispose of the material on-site. Because this site is an active mining operation, the reclamation of this facility will be required sometime in the future. Therefore, permitting of a landfill would also benefit Moab Salt when the mine is closed by providing an on-site disposal facility for demolition debris containing ACM.

Appendix A

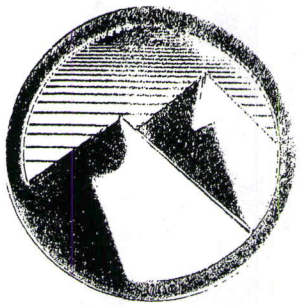
Asbestos Analytical Results

Printed Lab Analysis Not Yet Available

Appendix B

Asbestos Certifications

ROCKY MOUNTAIN CENTER FOR
OCCUPATIONAL AND
ENVIRONMENTAL HEALTH
Department of Family & Preventive Medicine
University of Utah
75 South 2000 East
Salt Lake City UT 84112-5120
Phone: (801) 581-5710
Fax: (801) 585-5275



THIS CERTIFIES THAT

Claude Dahlk

HAS COMPLETED THE REQUISITE TRAINING FOR ASBESTOS ACCREDITATION UNDER TSCA TITLE II

ATTENDED AN ANNUAL REFRESHER COURSE IN

PRACTICES AND PROCEDURES IN
ASBESTOS ABATEMENT

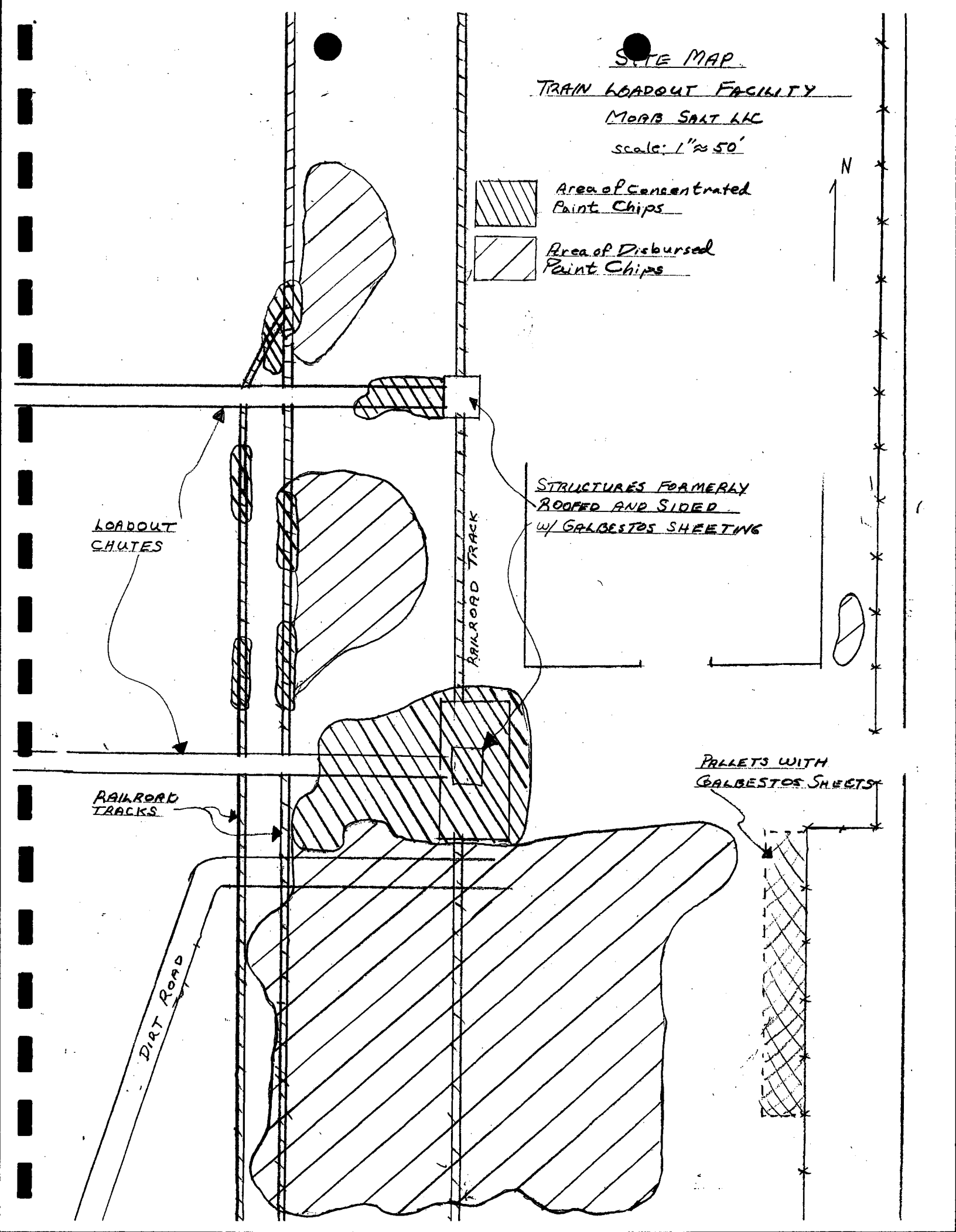
Asbestos Inspector/Management Planner Refresher

DATE: September 19, 2002
NUMBER: 220574
EXPIRES: September 19, 2003
CREDITS: 0.610 CEUs /1.0 ABIH CM points

Connie Crandall, MBA, MA
Continuing Education Director

Appendix C

Site Map


SITE MAP
TRAIN LOADOUT FACILITY
MOAB SALT LLC
scale: 1" ≈ 50'
N
Area of Concentrated Paint Chips
Area of Disbursed Paint Chips
STRUCTURES FORMERLY ROOFED AND SIDED W/ GALBESTOS SHEETING
LOADOUT CHUTES
RAILROAD TRACK
PALLETS WITH GALBESTOS SHEETS
RAILROAD TRACKS
DIRT ROAD

ASBESTOS ABATEMENT WORK PLAN
FOR THE TRAIN LOAD-OUT FACILITY
MOAB SALT, LLC
MOAB, UTAH

June 16, 2003

Prepared for:

Moab Salt, LLC
P.O. Box 1208
Moab, Utah 84532

Contact: Mr. Eric K. (Rick) York

Prepared by:

JBR Environmental Consultants, Inc.
8160 South Highland Drive
Sandy, Utah 84094

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Asbestos Abatement Work Plan
for the
Train Load-out Facility
Moab Salt, LLC

Approximately 12,000 square feet of Galbestos® sheets were removed by Moab Salt, LLC employees during renovation of the Train Load-out building. The sheets were removed from the structure and placed on pallets near the southeast fence area of the mine site. The handling of this material caused pieces of asbestos-containing paint to be scattered within the project area identified on the Site Map attached to this report. This work plan is designed to address the proper handling of these materials and associated contaminated soils. Due to time constraints and concerns for effects of the abatement on the mining operation, the plan is broken into the following two phases.

Phase One: Includes the proper handling and disposal of the pallets of Galbestos® sheeting and contaminated soils within the project area (refer to Site Map) located near the Train Load-out facility. JBR Environmental Consultants, Inc. (JBR) will be on-site to conduct daily air monitoring down-wind from the remediation activities throughout Phase One.

Phase Two: All employees will have at a minimum two (2)-hour awareness training for known asbestos hazards on-site. In addition, several employees will be 40-hour trained as EPA certified Contractor/Supervisors to enable in-house removal of future asbestos containing materials. This phase is scheduled to occur on site during the week of June 23, 2003 and will be carried out by the Rocky Mountain Center for Occupational and Environmental Health.

In addition, during this phase, JBR will conduct a detailed inspection of all buildings located at the Moab Salt mine site. This inspection will account for all accessible areas containing asbestos that present hazards to the employees. For areas that are deemed severely damaged with high potential for employee exposure, the areas will be isolated and remediated by Environmental Abatement, Inc. (EAI).

1.0 BACKGROUND

Moab Salt, LLC employees removed Galbestos® sheets[1] from the Train Load-out building and the North Load-out Chute area during renovations to the structure. The sheets were placed on pallets for eventual disposal. This activity was reported to the Utah Division of Air Quality (DAQ), Mine Safety & Health Administration, and a local television news station.

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[1]Galbestos® is a trade name for corrugated and galvanized steel sheeting covered with an asbestos-containing coating that is comprised of a a binder containing Chrysotile asbestos.

JBR was contacted on June 11, 2003 to investigate the incident and provide recommendations for remediation. On June 13, 2003, JBR conducted an inspection of the Train Load-out facility for asbestos containing materials and potential hazards for employee exposures. JBR recommended isolating the area with barrier tape and not allowing access to the area until mitigation activities could be coordinated and carried out. Please refer to JBR's *Asbestos Inspection and Assessment Report* dated June 16, 2003 for a detailed summary of this investigation.

1.1 Galbestos® Siding

The removed asbestos containing sheeting has been placed on pallets and stored along the southeast fence near the Train Load-out facility. The sheets in their present state have been determined to be friable and are required to be handled as friable asbestos materials. If left undisturbed the potential for fiber release due to wind is minimal as the green paint is protecting the asbestos underlayment from wind erosion. Water was not used during removal of the sheeting for the following reasons: 1) employees had not been trained in the proper methods of asbestos removal; and, 2) had water been used improperly under high pressure, hydraulic abrasion of the of the asbestos/paint coating could have occurred, resulting in increased potential for fiber release and further contamination of the soils. Most of the buildings on-site contain this type of sheeting as both walls and roofing.

1.2 Contaminated Soils - Paint Chips

During JBR's site visit on June 13, 2003, the area near the Train Load-out facility and all adjacent soils were inspected for the presence of asbestos paint chips. The site map illustrates the extent of the contamination. Areas nearest the load-out building and the North Load-out Chute contained the greatest concentration of paint chips while outlying areas up to approximately 150 feet away had minimal paint chips present. For areas with substantial paint chips, all soils and associated paint chips will be excavated to a depth of two (2) inches. For the outlying areas, the paint chips and adjacent, contaminated soils can be collected using hand tools and placed into proper asbestos bags for eventual disposal.

1.3 Other Asbestos Containing Materials

As part of Phase 2 of this project, JBR will inspect each building at the Moab Salt mine and render a determination for potential employee exposures to all asbestos containing materials within each building. This report will document all accessible asbestos materials. This work plan is designed to cover all damaged asbestos-containing materials found within the project boundaries as given in the Site Map.

2.0 GENERAL SITE REQUIREMENTS

All work on this project will conform to the applicable Federal and State regulations governing asbestos. This includes but is not limited to OSHA regulations 29 CFR 1926.1101 Asbestos, EPA regulations 40 CFR 61.140 through 61.156, and Utah Air Quality Rule R307-801 Asbestos.

JBR Environmental Consultants, Inc. has been retained to oversee the remediation work performed by the abatement firm. The heavy equipment and operators required to perform the work outlined in this work plan will be provided by Environmental Abatement, Inc. (EAI) a licensed abatement firm.

2.1 Notification

An initial NESHAP notification was submitted by EAI with this plan. All subsequent work performed at this site will fall under this original notification. As work proceeds additional amendments will be made by the abatement contractor as needed. Amended Notifications will conform to the Utah Air Conservation Rule R307-801-12.

2.2 Worker Requirements

This project requires the following individuals with the listed certifications.

Asbestos Abatement Supervisor: All asbestos abatement will be performed under the direction of a State of Utah certified asbestos abatement supervisor. This individual must have a current certification card from the DAQ, have had an asbestos medical examination within the past year and be employed by a licensed Asbestos Abatement Company. At this time the abatement firm is Environmental Abatement, Inc.

Asbestos Abatement Worker: All asbestos abatement will be performed by a state of Utah certified asbestos abatement worker or supervisor. Workers must have current certification cards from the DAQ, have had an asbestos medical examination within the past year and be employed by a licensed Asbestos Abatement Company. At this time the abatement firm is Environmental Abatement, Inc.

Asbestos Inspector: Inspectors will have state certification cards, current respirator or asbestos physicals and be employed by a state-certified asbestos contractor company. At this time the consultant is JBR Environmental Consultants, Inc.

2.3 Decontamination Stations and Procedures

2.3.1 Personnel Decontamination

All individuals working inside regulated work areas are required to enter and exit the area through a 3-stage decontamination station. The decontamination station will be located adjacent to the regulated work areas. In the event that additional ACM is found during soil removal operations described in Section 3.0, the use of a remote decontamination station may be used at the abatement contractors discretion and in compliance with R307-801-14(5)(d).

2.3.2 Excavation Equipment Decontamination

Staging areas, within the boundary of the regulated area, will be created. These areas will serve as decontamination stations for equipment only. The following procedures will be followed:

- Staging area size and location will be sufficient to allow easy access to and from the regulated work area.
- The driveway area will be kept free of asbestos containing waste materials at all times. Drivers of transportation vehicles will exit the vehicle to load the roll-off box prior to transportation to the disposal site.
- Sufficient water resources are required in each staging area to effectively decontaminate all equipment that may become contaminated.
- Roll-off boxes will be positioned such that the loading equipment can fill the vehicle without contaminating the driveway.
- The bed of the roll-off box will be lined with two layers of 6 mil poly sheeting by the asbestos abatement crew. The sheeting will be left hanging on the filling side of the bed to help keep the side of the vehicle clean. Once the bed is loaded, the two layers of sheeting will be sealed over the top of the debris. The vehicle and surrounding areas will be inspected and all asbestos contaminated waste cleaned from the driveway and the vehicle. Specific attention shall be paid to the bed, tailgate, and tires. Contaminated debris shall be cleaned from the vehicle before it is given permission to leave the site. When cleared of contaminated waste the vehicle will then be given permission to leave the staging area and drive directly to the disposal site.
- At the conclusion of soil remediation the staging area will be used to decontaminate all heavy equipment prior to leaving the site.

2.3.3 Personnel Protective Equipment

All workers within regulated work areas are required to wear standard asbestos abatement PPE for OSHA Class I work. This includes disposable Tyvek clothing, and a minimum of half face air purifying respirators fitted with P-100 cartridges. Gloves, eye protection, hard hats, and steel toed footwear is required as the work situation requires.

Drivers of transportation vehicles entering staging areas are required wear at a minimum gloves, eye protection, hard hats, and steel toed footwear during load-out operations and in compliance with MSHA regulations. Disposable clothing, and gloves will be provided by the abatement firm. Each employer is responsible for providing respiratory protection equipment and supplies to their own employees.

2.5 Personal Exposure Monitoring

The abatement contractor is responsible for complying with the OSHA requirements for exposure monitoring for their employees. This includes an "initial exposure assessment" if a "negative exposure assessment" for this type of work has not been performed within the last 12 months. Based on the results of these initial assessments subsequent personal monitoring will be performed in accordance with 29 CFR 1926.1101.

2.6 Area Air Monitoring

Area air monitoring will be conducted at the down-wind perimeter of the regulated area to document actual airborne concentrations during remediation activities. Samples will be analyzed using PCM methods. TEM analysis may be employed to aid in differentiating asbestos structures from PCM fibers should the need arise. The sampling will be conducted by JBR Environmental Consultants, Inc.

2.7 Water Requirements

Asbestos abatement and debris movement require large amounts of water. Moab Salt, LLC is providing water to the site through fire hydrants within the regulated area. EAI will provide fire and water hoses to deliver the water as required by the project. If the project requires additional water resources, Moab Salt will provide a water truck with water hose attachments to provide wetting.

Phase One includes standard abatement techniques where all asbestos containing waste materials must be thoroughly wet to maintain zero visible emissions. The entire work area is to be free of visible emissions meaning that the entire surface of the regulated area needs to be kept damp. The metal sheeting shall be wetted prior to any handling to minimize possible fiber release through handling. All areas where heavy equipment such as a bobcat or back-hoe is used, shall be throughly wetted so that there are no visible emission during abatement activities.

3.0 PHASE ONE

3.1 Abatement Work

Phase One is considered outdoor asbestos abatement and will be performed in accordance with R307-801-14(4). A regulated work area has been established in accordance with both EPA and OSHA requirements. Additional barrier tape, signs and a three-stage decontamination station shall be placed at the work site as required. The abatement work will start in the area where the Galbestos® sheeting is currently located. The sheeting shall be throughly wetted and then placed into a double lined roll-off for containerization. The roll-off shall be placed as close as possible to the pallet area to minimize further cross-contamination.

A state-certified asbestos inspector will be onsite to inspect the progress and perform final visual inspections of the abated areas. As discrete areas are inspected and found free of visible asbestos debris, the regulated area boundaries will be adjusted to remove the cleared area from the regulated area.

All waste generated in this phase will be contained in a minimum of two layers of 6-mil poly sheeting and transported to the disposal site at ECDC. Due to logistical issues resulting from the property configuration, wastes may be stored for a short period of time prior to transportation to the disposal facility.

Abatement will begin at the outer boundaries of the regulated area and will include paint chip removal by hand. All pieces of visible asbestos waste and the surrounding soil will be wetted with amended water and placed into properly labeled bags by abatement workers. When all visible paint chips have been removed from these areas, the soil will be raked to search for additional asbestos waste. Areas where additional asbestos waste is found by raking will be further inspected and the additional debris found properly wet and containerized.

Based on the information obtained regarding this project, subsurface contamination within the outer perimeter of the source is not expected to be found. If the abatement and inspection process prove otherwise this work plan may need to be amended.

For areas of concentrated paint chips, the contractor will use a bobcat or back-hoe to remove the paint chips and associated contaminated soils to a depth of two (2) inches. The soils and asbestos material shall be wetted with amended water prior to any excavation of the areas. The areas with soils contaminated by paint chips, as identified on the site map, are nearest the Train Load-out building and the north Load-out Chute area. All contaminated soils between the railroad tracks will be properly wetted and shoveled out by hand to avoid any damage to the railway ties. The contaminated soils shall be placed into a double lined roll-off for eventual disposal to ECDC.

3.2 Work Following Abatement

When a sufficient area has been abated, cleared, and the regulated work area boundaries have been removed the area will be open for re-occupation to mining personnel as needed to complete their daily duties.

4.0 PHASE TWO

All employees will have at a minimum two (2) hour awareness training for known asbestos hazards on-site. In addition, several employees will be 40 hour trained as EPA certified Contractor/Supervisors to enable future in-house removal of asbestos containing materials. This phase is scheduled for the week of June 23, 2003 and will be carried out by the Rocky Mountain Center for Occupational and Environmental Health.

JBR will provide a Utah certified inspector to conduct on-site project management of the abatement activities, collect area air samples, and conduct a comprehensive asbestos inspection of the remaining structures. The inspection will include all levels of exposure hazards that employees may encounter during a typical work shift. JBR will generate an inspection report complete with recommendations for additional abatements as they pertain to employee exposure.

5.0 WORK SEQUENCING

For the reasons expressed in the emergency notification, Moab Salt, LLC would like to begin the work immediately. The abatement contractor can begin mobilization to the site for Phase 1 on Tuesday June 17, 2003 and begin abatement on Wednesday June 18, 2003. JBR estimates that Phase 1 of the project will be completed no later than June 24, 2003. Phase 2 will begin no later than June 23, 2003 and continue until complete.

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